## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

DICKSON INDUSTRIES, INC., an Oklahoma corporation,	)
Plaintiff,	)
VS.	) CASE NO. CIV-02-467-HE
PATENT ENFORCEMENT TEAM, L.L.C., a Florida limited liability company,	) ) )
Defendant,	)
VS.	)
MIDSTATE TRAFFIC CONTROLS, INC., an Oklahoma corporation,	) ) )
and	)
SAWHORSE INVESTMENTS, L.L.C., an Oklahoma limited liability company,	) ) )
Third-party defendants.	, )

## DEFENDANT PATENT ENFORCEMENT TEAM, LLC'S PROPOSED VOIR DIRE QUESTIONS

PATENT ENFORCEMENT TEAM, LLC. Defendant, through its undersigned counsel, respectfully submit its voir dire questions for consideration by the Court. For each affirmative answer, the potential juror should be asked for an explanation:

- 1. Do you know or have you heard about any of the parties to this dispute?
- 2. Do you know or have you heard about Mr. Steve Wells of Sawhorse designs?
- 3. Do you know or have you heard about Mr. Wayne Dickson of Dickson Industries?

4. Do you know or have you heard about any of the following who may be witnesses at trial?

Chris Bailey	Jeff Arnswald	James Whitney
Glen Shed	Alan Brandt	Tom Massaro
Terri Dickson	Glen Thomas	Chad Thomas
Robert Saaco	Kristen Wood	Jeffrey Kinrich
Len Scantling	Diana Jordan	

- 5. Do you know or have you heard about any of the attorneys or law firms in this case?
- 6. Have you, your family member, or a close ever worked for a law firm.
- 7. Have you, your family member, or a close friend ever had any legal training?
- 8. Have you, your family member, or a close friend ever had any scientific or engineering training?
- 9. Have you ever worked for a company involved in building roads, paving roads, driveways or parking lots, putting stripes on roads, driveways or parking lots, or putting speed bumps or rumble strips on roads.
- 10. Have you ever driven on a road that has rumble strips? If so,
  - (a) Have you ever driven over rumble strips?
  - (b) How did you react or respond when you drove on the rumble strips?
  - (c) Were the rumble strips helpful
  - (d) Were the rumble strips a problem

- 11. Have you, your family member, or a close friend ever been involved in a truck or car accident?
  - (a) Did the road have any rumble strips?
- (b) If there were no rumble strips, would rumble strips have helped to prevent the accident?
  - (c) If there were rumble strips, did they play any part in the accident?
- 12. Have you, a member of your family or a close friend ever invented something? If yes, briefly describe the invention.
- 13. Have you, a member of your family or a close friend ever applied for a patent(s)?

  If yes,
  - (a) Who applied for the patent(s)?
  - (b) Were the patent(s) granted?
  - (c) What were the patent(s) about?
  - (d) Explain your experience and dealings with the Patent Office;
  - (e) Do you hold or own any patents?
  - (f) Do you have any knowledge about the procedure for obtaining a patent?
- 14. Has an idea of yours, or an idea of a member of your family, or an idea of a close friend ever been stolen or have your ever been accused of stealing an idea from someone else? If yes, briefly describe what happened?
- 15. Does the company you work for have any patents? If yes, what are the patents about?

- 16. Have you or a family member ever owned a company? If yes, briefly describe the company and the business of the company.
- 17. Do you think it is wrong to own patents?
- 18. If you own a patent, do you think it is wrong to attempt enforce the patent by suing a company that you believe is infringing the patent?
- 19. Have you, a member of your family, or a close friend ever been accused of patent infringement?
- 20. Do you or a family member or a close friend have any training or experience in designing machines or equipment?
- 21. Do you have any difficulties understanding how machines work?

Dated this 15<sup>th</sup> DAY of JUNE 2007.

Respectfully submitted,

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s/Micheal Salem

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Attorneys for Defendant PATENT ENFORCEMENT TEAM, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically transmitted this document to the Clerk of the United States District Court for the Western District of Oklahoma using the ECF System for filing and transmittal of notice of electronic filing to the following ECF registrants:

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this 15<sup>th</sup> DAY of JUNE 2007.

s/Micheal Salem
MICHEAL SALEM